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Attorney for Shelli Frazier

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MONTANA**

IN RE:

RICHARD T. SHEEHAN,

Debtor.

**SHELLI R. FRAZIER and SHELLI
FRAZIER as the Natural Parent
and Guardian of D. R. S.
S. [REDACTED],**

Plaintiffs,

-vs-

RICHARD T. SHEEHAN,

Defendant(s).

Case No. 20-20054-7

**UNOPPOSED REQUEST TO
AMEND COMPLAINT NUNC PRO
TUNC**

Adversary No. 20-02005

COMES NOW Shelli R. Frazier, in her individual capacity and as the natural parent and guardian of D.R.S. ("Shelli Frazier"), by and through her counsel of record, and hereby files this Request to Amend Complaint Nunc Pro Tunc as follows:

The original prayer for relief erroneously requested relief under § 523(a)(2)(A) of the Bankruptcy Code, but as stated in Ms. Frazier's Complaint, she is seeking relief under § 523(a)(6) of the Bankruptcy Code.

Edward A. Murphy, counsel for Richard T. Sheehan, has been contacted concerning this request and has no objection.

DATED this 6th day of August, 2020.

LAIRD COWLEY, PLLC

By: /s/ Jane E. Cowley

Jane E. Cowley
Attorney for Shelli Frazier